

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**UNITED STATES OF AMERICA**

**vs.**

**JOSE MARCILIO CAVAZOS, JR.,  
DEFENDANT**

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**Criminal Complaint No.  
04-MJ-00045 LPC**

**MOTION FOR RELEASE AND REQUEST FOR A HEARING REGARDING  
CONTINUED PRE-TRIAL DETENTION**

Now comes the defendant, Jose Marcilio Cavazos, Jr., and requests that this Court:

1. Hold a hearing regarding his continued detention pending trial of this case, and
2. After hearing, order defendant's pre-trial release on such reporting conditions to the applicable Pretrial Services Office as this Court deems appropriate pursuant to 18 U.S.C. § 3142(c)(1)(A).

Respectfully submitted,  
The Defendant, by his attorney

/s/ Edward P. Ryan Jr.

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**Dated:** December 20, 2004